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June 8, 1992

BY HAND

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JUN - 8 1992

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Use of N11 Numbers
CC Docket No. 92-105

Dear Ms. Searcy:

As indicated in my June 5, 1992 transmittal letter, enclosed is the original of the comments filed on that date by the Canadian Steering Committee on Numbering. For convenience, also enclosed are an additional nine copies of the comments.

If you have any questions, please contact the undersigned.

Respectfully submitted,

A. Richard Metzger, Jr.

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Enclosure

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CSCN

Canadian Steering Committee on Numbering

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Federal Communications Commission
1919 M. Street N.W.
Washington D.C.
20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Subject: Comments on Notice of Proposed Rulemaking
CC Docket No. 92-105

The Canadian Steering Committee on Numbering, (CSCN) has reviewed the CC Docket No. 92-105 and submits the following comments:

As you are aware, Canada and the Caribbean are an integral part of the North American Numbering Plan and we believe it is in the public interest to ensure that, where possible, dialing plans and number assignment for all service offerings should be as fair, equitable and universal as practically possible.

In Canada, the Minister of Communications has the responsibility to oversee the administration of numbering plan resources in Canada, and to ensure that these resources are available to meet the demand for service evolution and that they are managed in the best interests of the public at large. The Canadian Government has indicated that it shares the position taken by the Federal Communications Commission that specific numbering issues should be resolved through the cooperative efforts of the telecommunications industry. To facilitate this process, the CSCN has been established under the auspices of the Department of Communications, and has been given the authority to develop strategies, appropriate guidelines and procedures that best represent overall interests in numbering planning and implementation for the Canadian telecommunications industry and the users. The current CSCN membership list is attached.

It is desirable, and we believe in the public interest, that the application of N11 codes be uniform and consistent throughout the entire World Zone 1 Sector. The public currently associates the N11 type codes with basic or adjunct to basic services, such as emergency services. It is our view that N11 codes should be primarily designated for basic or as an adjunct to basic services of a universal social value; for example, improving network access for the physically challenged, rather than for commercial advantage of certain industry segments. To assign these codes to other applications, not consistent throughout the NANP, could lead to customer confusion, particularly to the traveling public.

Moreover, scarce NANP resources like N11 codes must be planned and assigned in the most industry efficient manner possible. The benefits of assignment of N11 codes for abbreviated dialling to selected sectors of the World Zone 1 marketplace must be weighed against more widely usable options, such as opening N11 codes as full NPAs, in the face of potential NPA exhaust prior to the introduction of interchangeable NPA codes in January 1995.

We believe that services of the type discussed in the FCC Docket , could be more appropriately provided using other special service number assignments (e.g. SAC 900, 976), which the public already associate with pay for call type services. Alternatively, non NANP technical options may be available to satisfy such requirements (e.g. vertical service codes, customer premises equipment capabilities).

However should the FCC decide, after reviewing the comments on CC Docket number 92-105, that the assignment of N11 type codes for abbreviated dialling to support "local pay per call" applications should be permitted, we strongly support the position that such an assignment would be clearly identified as being subject to discontinuance and preemption by a requirement for an agreed industry wide use of such N11 resources. Moreover, we believe that enforcing discontinuance, once substantial financial and resource commitments have been made, would prove to be a difficult task.

We express our concern that if N11 codes are used for the proposed commercial application, the resource would be rapidly exhausted. Since this would result in only a very few entries having access to these codes it could be construed as providing an unwarranted competitive advantage and an undue preference.

We commend the FCC's initiative in soliciting public comment on issues such as this, and we believe that such a process provides the opportunity to ensure that NANP numbering resources are assigned in a fair and equitable manner in support of uniform services throughout World Zone 1, which we believe is in the best interests of all parties and, in particular, the public at large.



Chairman
Canadian Steering Committee on Numbering

cc: Communications Canada
Canadian Radio-television and Telecommunications Commission

CSCN Members

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Canadian Independent

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Communications Canada (ex officio)